



# CHEMTRADE

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BAY AREA AIR QUALITY  
MANAGEMENT DISTRICT

July 27, 2018

Mr. Kelly Wee  
Director of Compliance and Enforcement  
Attention: Title V Reports  
Bay Area Air Quality Management District  
375 Beale Street #600  
San Francisco, CA 94105

**Re: Chemtrade West US LLC – Richmond, Facility #A0023**

**Title V Semiannual Report – Q1/Q2 2018**

Dear Mr. Wee:

Please find enclosed the corrected semiannual monitoring report for Chemtrade West US LLC – Richmond for the reporting period of January 1, 2018 – June 30, 2018.

There was one instance of non-compliance during the reporting period. The source failed the O2 RATA conducted on June 14<sup>th</sup>, 2018. The source was retested again on July 25, 2018. The original results were submitted to the district and the more recent results will be submitted when they are received.

Attached are semi-annual throughputs for this reporting period.

If you should have any questions, please contact Andrew Hornbeck, EH&S Supervisor, at (510) 232-7193 x224.

Sincerely yours,

Mike Shepherd  
Plant Manager  
Chemtrade West US LLC – Richmond

cc: Director of the Air Division  
USEPA, Region IX  
Attention: Air - 3  
75 Hawthorne Street  
San Francisco, CA 94105

## Compliance Certification

Based on information and belief formed after reasonable inquiry, the statements and information in the attached Data Update form are true, accurate, and complete.

Mike Shepherd  
Name of Responsible Official

  
Signature

Certification Period: January 1, 2018 through June 30, 2018

07/27/2018  
Date

Facility A0023  
Chemtrade West, US LLC  
525 Castro Street  
Richmond, CA 94801

**Chemtrade West US LLC**  
**Richmond Works- Facility #A0023**  
**Title V - Semi Annual Monitoring Report**  
**Period: 01/01/18 - 06/30/18**

Source	Pollutant	Emission Limit Citation	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Results
S-1 Sulfuric Acid Mfg.	SO <sub>2</sub>	SIP 9-1-308.2	Gasceous emissions from any source at an H <sub>2</sub> SO <sub>4</sub> plant shall not exceed 300 ppmv @ 12% O <sub>2</sub>	SIP 9-1-502	C	CEM	01/01/18 - 06/30/18 Submitted monthly via CEM reports.
	SO <sub>2</sub>	BAAQMD Regulation 9-1-309	Gasceous emissions from any source at an H <sub>2</sub> SO <sub>4</sub> plant shall not exceed 300 ppmv @ 12% O <sub>2</sub>	SIP 9-1-502	C	CEM	01/01/18 - 06/30/18 Submitted monthly via CEM reports.
	Acid Mist	BAAQMD Regulation 12-6-301	Gasceous emissions from any source at an H <sub>2</sub> SO <sub>4</sub> plant shall not exceed 0.15 g/kg (0.3 lb/ton) of acid produced	BAAQMD Condition # 14980	P/A	Source Test	Source test performed on June 14, 2018. Results were submitted to Source Test and Enforcement Division. Source failed the O2 RATA portion of the test and has rescheduled it for July 2018.
S-9 Process Air Heater	NOx, CO, VOC, PM10	BAAQMD Condition# 7934 Part 2	Fuel consumption shall not exceed 61.3 million cubic feet / 12 month period	BAAQMD Condition# 7934 Part 3	P/M	Monthly Records	Jan 3,512 mscf Feb 3,023 mscf Mar 3,673 mscf Apr 2,913 mscf May 3,551 mscf Jun 3,410 mscf
S-15 Startup Air Heater	NOx, CO, VOC, PM10	BAAQMD Condition# 7606 Part 2	Fuel consumption shall not exceed 5,000,000 cubic feet / 12 month period	BAAQMD Condition# 7606 Part 2	P/M	Monthly Records	Jan 4,895 scf Feb 71,273 scf Mar 31,263 scf Apr 57,095 scf May 0 scf Jun 0 scf

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Source	Pollutant	Emission Limit Citation	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Results
S-16 Alkylation Storage Tank # 13	VOC, PM10	BAAQMD Condition# 13215 Part 1	Throughput shall not exceed 146,000 ton / 12 month period	BAAQMD Condition# 13215 Part 1	P/M	Monthly Records	Jan 0 tons
							Feb 0 tons
							Mar 0 tons
							Apr 0 tons
							May 0 tons
							Jun 0 tons
S-24 Elec. Grade Sulfuric Acid Mfg.	SO <sub>2</sub>	SIP 9-1-308.2	Gaseous emissions from any source at an H <sub>2</sub> SO <sub>4</sub> plant shall not exceed 300 ppmv @ 12% O <sub>2</sub>	SIP 9-1-502	C	CEM	01/01/18 - 6/30/18 Submitted monthly via CEM reports.
	SO <sub>2</sub>	BAAQMD Regulation 9-1-309	Gaseous emissions from any source at an H <sub>2</sub> SO <sub>4</sub> plant shall not exceed 300 ppmv @ 12% O <sub>2</sub>	SIP 9-1-502	C	CEM	01/01/18 - 06/30/18 Submitted monthly via CEM reports.
		BAAQMD Condition# 13507 Part 1	Production shall not exceed 15,000 ton / 12 month period	BAAQMD Condition# 13507 Part 3	P/M	Monthly Records	Jan 697 tons
							Feb 648 tons
S-32 Alkylation Storage Tank # 14	VOC, PM10	BAAQMD Condition# 13889 Part 2	Throughput shall not exceed 219,000 ton / 12 month period	BAAQMD Condition # 13889 Part 3	P/M	Monthly Records	Mar 719 tons
							Apr 699 tons
							May 949 tons
							Jun 999 tons
							Jan 0 tons
							Feb 0 tons
							Mar 0 tons
							Apr 0 tons
							May 0 tons
							Jun 0 tons

**Chemtrade West US LLC**  
**Richmond Works- Facility #A0023**  
**Title V - Semi Annual Monitoring Report**  
**Period: 01/01/18 - 06/30/18**

Source	Pollutant	Emission Limit Citation	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Results
S-36 Process Air Heater	NOx, CO, POC	BAAQMD Condition# 20509 Part 3, 40 CFR 63 , Subpart ZZZZ	Gaseous emissions shall not exceed NOX 0.15 g/bhp-hr, CO 0.6 g/bhp-hr, POC 0.15 g/bhp-hr , 47 ppmv CO	BAAQMD Condition# 20509 Part 4, 40 CFR 63 , Subpart ZZZZ	P	Semi-annual Source Test	S-36 was not operational during this time period
S-36 Process Air Heater	Temperature and Pressure	N/A	Maintain Temperature between 450F and 1350F, Maintain catalyst so pressure drop does not change by more than 2 inches of water	40 CFR 63 Subpart ZZZZ	C	Continuous	S-36 was not operational during this time period



CHEMTRADE

525 Castro Street, Richmond, CA 94801

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Director of Compliance and Enforcement  
Attn: Title V Reports  
Bay Area Air Quality Management District  
375 Beale St. Suite 600  
San Francisco, CA 94105

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BAY AREA AIR QUALITY  
MANAGEMENT DISTRICT